

January 5, 2016

Honorable James B. Clark, III, U.S.M.J.
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Roberts v. County of Essex, et al.
Docket No. 2:15-cv-7061-KM-JBC

Dear Judge Clark:

I represent the County of Essex in the above-captioned matter.

We filed a motion to dismiss on behalf of the County of Essex on November 25, 2015. Plaintiff filed a response on January 4, 2015.

On December 14, 2015 the Court signed an order allowing the State of New Jersey, representing Essex County Prosecutor's Office, Assistant Prosecutor Robert D. Laurino and Detective Michele R. Bolan, an additional 60 days until February 8, 2016 to file responsive pleadings.

I recently had surgery and was basically out from December 16, 2015 to January 4, 2016. I am expecting another surgery within a month or so.

I respectfully request that our motion date be adjourned to February 15, 2016 with our brief due February 8, 2016, with the consent of plaintiff's counsel, Ms. Fisch and Benjamin Zieman, counsel for the Essex County Prosecutor's Office and their individual defendants

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Thank you for your attention to our request.

Respectfully submitted,

s/Alan Ruddy
Alan Ruddy
Assistant County Counsel
(973-621-5021)

AR/gs
cc/all counsel